

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

RACHEL RAMSBOTTOM, ET AL.,)	
)	
Plaintiffs,)	
)	CIVIL ACTION NO. 3:21-cv-00272
v.)	
)	JURY TRIAL DEMANDED
LORIN ASHTON,)	
)	MAGISTRATE JUDGE JEFFERY S.
Defendant.)	FRENSLEY
)	
)	
)	
)	
)	
)	

DEFENDANT LORIN ASHTON’S MOTION FOR A PROTECTIVE ORDER

Defendant Lorin Ashton (“Defendant”), by and through undersigned counsel, respectfully submits this Motion for a Protective Order under Local Rule 37.01 and Rule 26(c) of the Federal Rules of Civil Procedure. In support, Defendant states as follows:

1. On Wednesday, September 28, 2022, the Court held a discovery dispute telephone conference with counsel for the parties. (See Minute Entry of Sep. 28, 2022).
2. During the conference, the Court granted Defendant leave to file this motion to determine whether Plaintiffs¹ should be precluded from seeking discovery on Defendant’s settlement agreements, contracts, waivers, non-disclosure agreements, confidentiality agreements, or the like (collectively referred to as “settlement documentation”) with his non-party sexual partners.

¹ The term “Plaintiffs” collectively refers to Plaintiffs Rachel Ramsbottom (“Ramsbottom”), Alexis Bowling (“Bowling”) and Jenna Houston (“Houston”).

3. Plaintiffs served requests for production on May 20, 2022. *See* Declaration and Certification of Mitchell Schuster in Support of Defendant’s Motion for Protective Order (“Schuster Decl.”); *id.*, Ex. A. On June 21, 2022, Defendant responded. *Id.* at Ex. B. On July 20, 2022, Plaintiffs’ counsel emailed a letter asserting issues with Defendant’s response to Plaintiff’s Request for Production No. 14, which sought settlement documentation from Defendant. *Id.* at Ex. C. On top of this request, Defendant expects that Plaintiffs will seek discovery about settlement documentation through other means.

4. The settlement documentation requested by Plaintiffs is irrelevant and inadmissible. Moreover, any such documentation is protected from disclosure under Defendant’s and his non-party sexual partners’ constitutional right to privacy.

5. Accordingly, Defendant asks the Court to enter a protective order prohibiting Plaintiffs from seeking any discovery about Defendant’s settlement documentation with his non-party sexual partners.

6. Counsel for Defendant have conferred with counsel for Plaintiffs under Local Rule 7.01(a)(1) and can report that this relief is opposed, as outlined in detail in Defendant’s memorandum of law. These matters came before the Court during the September 28, 2022, discovery dispute telephone conference, and no resolution was reached on the relief requested herein.

For these reasons and those stated in the contemporaneously filed memorandum of law in support of this motion, Defendant asks the Court to enter a protective order prohibiting Plaintiffs from seeking any discovery about Defendant’s settlement agreements, contracts, waivers, non-disclosure agreements, confidentiality agreements, or the like with his non-party sexual partners, and for all other relief the Court deems just and proper.

Dated: October 14, 2022

Respectfully submitted,

s/ Robert A. Peal

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and exact copy of the foregoing was served on the following counsel via the Court's CM/ECF system on this 14th day of October, 2022:

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